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July 8, 2008

Via DHL and Electronically Filed

Honorable Stanley R. Chesler, U.S.D.J.
United States District Court, District of New Jersey
U.S. Post Office and Courthouse Building
50 Walnut Street, Room 417
Newark, New Jersey 07101-0999

Re: **United States v. Steven Venechanos**
Crim. No. 05-533

Dear Judge Chesler:

Recently, Your Honor approved a Consent Order extending Mr. Venechanos' voluntary surrender to Tuesday, July 15, 2008. The Third Circuit is presently considering Mr. Venechanos' motion for bail pending appeal which Your Honor had previously denied. The Government timely filed its response to that motion yesterday, July 7, 2008.

I write on behalf of Mr. Venechanos to request another brief extension of his voluntary surrender date. It has to do with the medical condition of his youngest daughter Lauren. Lauren was seriously injured on June 19, 2008 while playing on her softball team. She had a collision with another player during the game and suffered a broken jaw. Medical procedures were preformed which required the wiring of her jaw by an oral surgeon. I have been advised that her treatment will be complete by Friday, August 8, 2008. Therefore, we respectfully request that Your Honor please consider extending Mr. Venechanos' surrender date to Monday, August 11, 2008.

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Mr. Fietkiewicz has advised that the Government does not consent to this application. However, given the circumstances of this child's injury, and the twenty-six (26) day extension that is sought, we respectfully request that the Court grant this application. Thank you for your attention to this matter.

Respectfully submitted,

ARSENEAULT, WHIPPLE, FARMER,
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By: s/John C. Whipple
John C. Whipple (JW 1591)

JCW:dn

cc: John M. Fietkiewicz, Esq., A.U.S.A.
Lawrence S. Lustberg, Esq.
Mr. Steven Venechanos

SO ORDERED:


STANLEY R. CHESLER, U.S.D.J.